

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

**S.H., individually, and on behalf  
of all others similarly situated,**

**Plaintiffs,**

v.

**No: 2:23-cv-00071-TRM-JEM**

**CITY OF JOHNSON CITY, TENNESSEE,**

**Defendant.**

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**NOTICE OF ERRATA**

Plaintiffs, by and through counsel, hereby submit this Notice of Errata to correct a clerical error in the Motion for Preliminary Approval of Class Action Settlement filed on May 19, 2025 (ECF 515).

In that motion, Plaintiffs' counsel incorrectly stated that they will seek reimbursement of litigation costs in an amount not to exceed \$20,000. *See id.* at 22. The correct amount is \$50,000. This amount is an estimated maximum for purposes of seeking preliminary approval. In their motion for attorneys' fees and costs, which would be filed concurrently with the motion for final approval, Plaintiffs' counsel will seek reimbursement only for costs actually incurred.

The correct costs figure does not affect any other terms of the settlement or the relief sought in the motion. If preliminary approval is granted, the notice to the Class will reflect the correct amount. Defendant City has been advised of the error and does not object to the filing of this Errata. Plaintiffs respectfully request that the Court consider this corrected amount in evaluating the motion.

Respectfully submitted,

Date: June 20, 2025

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**CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on June 20, 2025 to counsel of record:

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